

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALEX GOLDFARB,

Plaintiff,

- against -

CHANNEL ONE RUSSIA,

Defendant.
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1:18-CV-08128 (JPC)

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PLAINTIFF'S ANSWER TO
CHANNEL ONE RUSSIA'S
COUNTERCLAIMS

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Plaintiff Alex Goldfarb, by his attorneys Rottenberg Lipman Rich P.C. and Rodney A. Smolla, for his answer to the counterclaims of defendant Channel One Russia ("Channel One"), alleges as follows:

1. Admits the allegations contained in paragraph 1.
2. Admits the allegations contained in paragraph 2.
3. Avers that paragraph 3 contains legal conclusions to which no responsive pleading is required and denies that Channel One has suffered any damages.
4. Avers that paragraph 4 contains legal conclusions to which no responsive pleading is required.
5. Avers that paragraph 5 contains legal conclusions to which no responsive pleading is required.
6. As his answer to the allegations contained in paragraph 6, respectfully refers the Court to his Complaint in this action for its full and complete contents.
7. As his answer to the allegations contained in paragraph 7, respectfully refers the Court to his Complaint in this action for its full and complete contents.

8. As his answer to the allegations contained in paragraph 8, respectfully refers the Court to his Complaint in this action for its full and complete contents.
9. As his answer to the allegations contained in paragraph 9, respectfully refers the court to his Complaint in this action for its full and complete contents.
10. Denies the allegations contained in paragraph 10.
11. Denies the allegations contained in paragraph 11.
12. As his answer to the allegations contained in paragraph 12, avers that Channel One knowingly and maliciously published the defamatory statements.
13. Denies the allegations contained in paragraph 13.
14. Denies the allegations contained in paragraph 14.
15. Denies the allegations contained in paragraph 15.
16. Denies the allegations contained in paragraph 16.
17. Admits the allegations contained in paragraph 17.
18. Denies the allegations in the first sentence of paragraph 18, respectfully refers to the communication cited for its full and complete contents, and denies the allegations contained in the second sentence of paragraph 18,
19. Admits the allegations contained in paragraph 19.
20. Denies the allegations contained in paragraph 20, and respectfully refers to the communication cited for its full and complete contents.
21. Admits the allegations contained in paragraph 21, and respectfully refers to the communication cited for its full and complete contents.
22. Denies the allegations contained in paragraph 22, and respectfully refers to the communication cited for its full and complete contents.

23. Denies the allegations contained in paragraph 23, and respectfully refers to the communication cited for its full and complete contents.
24. Admits the allegations contained in paragraph 24, and respectfully refers to the communication cited for its full and complete contents.
25. Admits the allegations contained in paragraph 25 and avers that the communication cited quoted from paragraph 10 of the Complaint.
26. Denies the allegations contained in paragraph 26, and respectfully refers to the communication cited for its full and complete contents.
27. Denies the allegations contained in the first sentence of paragraph 27, and admits the allegations contained in the second and third sentences of paragraph 27.
28. Denies the allegations contained in paragraph 28.
29. Denies the allegations contained in paragraph 29.
30. Repeats and realleges his answers to the allegations contained in paragraphs 1-29.
31. Denies the allegations contained in paragraph 31.
32. Denies the allegations contained in paragraph 32.
33. Denies the allegations contained in paragraph 33.
34. Repeats and realleges his answers to the allegations contained in paragraphs 1-29.
35. Denies the allegations contained in paragraph 35.
36. Denies the allegations contained in paragraph 36.
37. Denies the allegations contained in paragraph 37.
38. Denies the allegations contained in paragraph 38.
39. Repeats and realleges his answers to the allegations contained in paragraphs 1-29.
40. Denies the allegations contained in paragraph 40.

41. Denies the allegations contained in paragraph 41.

42. Denies the allegations contained in paragraph 42.

43. Denies the allegations contained in paragraph 43.

Dated: September 2, 2021
New York, New York



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Counsel for Plaintiff Alex Goldfarb